



FLORIDA DEPARTMENT OF Environmental Protection

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Tallahassee, FL 32399-2400

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Secretary

PERMITTEE

Vectorworks, Inc.
805 Marina Road
Titusville, Florida 32796

Authorized Representative:
Kurtis A. Hopf, President

Air Permit No. 0090127-015-AC
Permit Expires: June 30, 2022
Minor Air Construction Permit
Vectorworks Marine, LLC
Gelcoat Application Booth

PROJECT

This is the final air construction permit, which authorizes the installation of a new gelcoat application booth in the Lamination and Assembly building. The proposed work will be conducted at the existing Vectorworks Marine, LLC, which is a Boat Building and Repair Facility categorized under Standard Industrial Classification No. 3732. The existing facility is in Brevard County at 805 Marina Road in Titusville, Florida. The UTM coordinates are Zone 17, 518.01 kilometers (km) East and 3,166.10 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, no changes were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

David Lyle Read, P.E., Environmental Administrator
Office of Permitting and Compliance
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Kurtis A. Hopf, P.E., Vectorworks: khopf@vectorworks.com

Mr. Scott LaMarche, Vectorworks: slamarche@vectorworks.com

Mr. Thomas J. Mulligan, P.E., Mulligan Environmental LLC: tmulligan@mulligan-environmental.com

DEP Central District Office: DEP_CD@dep.state.fl.us

EPA Region 4: R4TitleVFL@epa.gov

Ms. Lynn Searce, DEP OPC: lynn.searce@floridadep.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

The Vectorworks facility manufactures computer numerical control plugs and molds used for boat manufacturing and other plastic components, fiberglass boats which vary in size and purpose, and non-boat-manufacturing related reinforced plastic composites. The facility consists of four main buildings designated as follows: an office building, a machining and offices building, an infusion molding and large lamination building, and a lamination and assembly building.

The existing facility consists of the following emissions units (EU).

EU No.	Description
001	Lamination/Gelcoating Operations and Related Activities
002	Adhesive Mixing/Packaging and Related Activities

PROPOSED PROJECT

Vectorworks is proposing to install a new gelcoat application booth in the Lamination and Assembly building (northernmost building) at the facility. This project is concurrently processed with Title V Air Operation Permit No. 0090127-016-AV.

This project will affect the following emissions unit.

EU No.	Description
001	Lamination/Gelcoating Operations and Related Activities

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the PSD of Air Quality.
- The facility operates units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Central District Office at: 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767. E-mail: DEP_CD@dep.state.fl.us.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).
4. Applicable Regulations, Forms, and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed, and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080, & 62-210.300(1), F.A.C.]
8. Source Obligation:
 - a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.[Rule 62-212.400(12), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Emissions Unit 001

This section of the permit addresses the following emissions unit.

EU No.	Description
001	Lamination/Gelcoating Operations and Related Activities

The project affects the Lamination and Assembly building that is part of Emissions Unit 001. The new gelcoat application booth will be installed within the Lamination and Assembly building (northernmost building at the facility). The booth will be used for atomized spray application of gelcoat. Emissions from the booth will pass through filters with 98% particulate capture efficiency before exhausting to the atmosphere at approximately 10,000 cubic feet per minute through a 2-foot diameter stack at a height of 40 feet, which is 6 feet above the building roof.

{Permitting Note: This emissions unit is regulated under NESHAP 40 CFR 63 Subpart A, General Provisions, Subpart VVVV, NESHAP for Boat Manufacturing, and Subpart WWWW, NESHAP: Reinforced Plastic Composites Production, all of which are adopted and incorporated by reference in Rule 62-204.800(11), F.A.C.}

EQUIPMENT

1. Gelcoat Application Booth: The permittee is authorized to install an enclosed booth within the Lamination and Assembly building to be used for the atomized spray application of gelcoat. [Application No. 0090127-015-AC]

PERFORMANCE RESTRICTIONS

2. Hours of Operation: The hours of operation of this emissions unit are not limited (i.e., 8,760 hours/year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

COMPLIANCE REQUIREMENTS

3. Federal NESHAP Requirements: The permittee shall comply with the applicable requirements of NESHAP 40 CFR 63, Subparts A, VVVV, and WWWW for operations that are part of Emissions Unit 001. [40 CFR 63.1(b) & (c)(1), 63.5683, 63.5785, and 63.5787]

RECORDS AND REPORTS

4. Project Completion Notification: The permittee shall notify the Permitting and Compliance Authorities within 30 days of completing the authorized construction. [Rule 62-4.070(3), F.A.C.]